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United States District Court
Eastern District of Pennsylvania
Charles Talbert Plaintiff
vs.
Keefe Group Defendant

Civil Action
No. 16 5543

Plaintiff

No. 16

5543

Defendant Complaint

I. Nature of Complaint

1. Plaintiff files this action against Defendants for unfair business practice within the Philadelphia Department of Prisons (PDP), in violation of State and Federal Laws.

II. Parties of Complaint

2. Plaintiff, is an adult individual, with a place of residence in Phila, PA.
3. Keefe Group (Keefe) is a corporation, with a principal place of business outside of Pennsylvania, contracted in Philadelphia, to provide commissary services to the PDP.

III. Facts of Complaint

4. Keefe, through all business staff that makes it a corporation, has implemented and maintained a widespread practice of substantially overcharging prisoners, within the PDP, for the items being sold to them through their commissary vendor.

5. The same items sold to prisoners within the Department of Corrections (DOC), is being sold by Keefe, to prisoners within the PDP, twice as much.

6. The significant cost increase is unfair, and oppressive upon Plaintiff, and others similarly situated.

7. By placing their items at such a high price, Plaintiff, and others similarly situated, have to spend eighty-five dollars

(\$85.00) every week, just to try to have enough food to last throughout the week, including hygiene products.

8. Even after spending \$85.00, the quantity of the commissary package demonstrates that the prices of each item are significantly higher than required.

9. Keeffe, has also implemented and maintained a widespread practice of overcharging Plaintiff, and others similarly situated, a one dollar (\$1.00) fee just in order to go to their vendor for purchasing which is unlawful and unfair.

10. Plaintiff, and others similarly situated, on several instances, had only \$1.00 in their prison account, to which they were denied access to Keeffe's commissary vendor to buy themselves a bar of soap to last them through the week.

11. Keeffe, has additionally implemented and maintained a widespread practice of selling single items, from out of its original box / package, for a significant gain, close to what the entire box / package would cost, which is unfair and oppressive.

12. Other prisoners within the DOC, similarly situated as Plaintiff and others within the PDP, enjoy their ability to be able to adequately manage their money buying commissary, and could spend only approximately thirty dollars (\$30.00), and get the same amount of commissary items as if Plaintiff would spend \$85.00 for, for the same exact items, which is not fair, due to the significant cost difference.

13. The excessive overcharges for Keeffe commissary items and its \$1.00 fee, together, is burdensome on Plaintiff and the family and friends that send Plaintiff money just to go to

Keeffe for commissary items so that he wont have to eat prison food and so that he can buy hygiene products to stay clean.

14. Keeffe, has used plaintiffs' and others similarly situated, condition, in regards to the grub that they serve for each meal, to influence them to buy from Keeffe, no matter what the price is.

15. Keeffe, has conspired through all of its business staff that make it a corporation, and with the City of Philadelphia, and with Aramark Corp, in manipulating Plaintiff and others to buy from them, at such a high cost, to avoid eating prison food.

16. Plaintiff, has been swindled, manipulated, and cheated out of several thousands of dollars over the years by Keeffe and its widespread practice of the aforementioned.

IV. Prayer For Relief

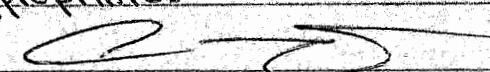
Wherefore, Plaintiff requests this Court to grant him relief in the form of :

17. Compensatory damages;

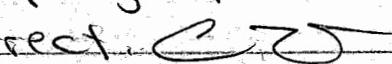
18. Punitive damages;

19. Reasonable cost and fees; and

20. Such other relief deemed appropriate.



Charles Talbert
143 W. Price Street
Phila. PA. 19136

I verify under penalty of perjury that the foregoing is true and correct. 

Charles Talbert